

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 23-CR-00131-WS-N
)	
RACQUELLE MARIE DOLORES ANTEOLA)	

FACTUAL RESUME

The defendant, **RACQUELLE MARIE DOLORES ANTEOLA**, admits the allegations of Count One of the Indictment.

ELEMENTS OF THE OFFENSE

RACQUELLE MARIE DOLORES ANTEOLA understands that in order to prove a violation of Title 21, United States Code, Section 846, as charged in Count One of the Indictment, the United States must prove:

- | | |
|---------|---|
| First: | That two or more persons in some way or manner, came to a mutual understanding to distribute cocaine, or to possess cocaine with intent to distribute it; and |
| Second: | That the defendant knowingly and willfully became a member of such conspiracy. |

OFFENSE CONDUCT

Defendant, **RACQUELLE MARIE DOLORES ANTEOLA (ANTEOLA)**, admits in open court and under oath that the following statement is true and correct and constitutes evidence in this case. This statement of facts is provided solely to assist the Court in determining whether a factual basis exists for ANTEOLA's plea of guilty. The statement of facts does not contain each and every fact known to ANTEOLA and to the United States concerning the defendant's involvement in the charges set forth in the plea agreement.

On June 1, 2023, a Mobile County Sheriff's Office Deputy conducted a traffic stop on a vehicle driven by the co-defendant, Melissa DUFOUR, with the defendant passenger, Racquelle Marie Dolores ANTEOLA ("ANTEOLA"), on Interstate 10 near Exit 8 in Mobile, Alabama, within the Southern District of Alabama. When questioned during the investigation of the traffic stop, DUFOUR and ANTEOLA made inconsistent statements about their travel history and plans and exhibited signs of nervousness. Deputies deployed K9 "Boyd," a narcotics detection dog, to conduct a free air search around the vehicle. K9 Boyd sniffed around the exterior of the vehicle and gave a positive alert for the odor of narcotics near the rear passenger side door.

During the probable cause search of the vehicle, law enforcement observed apparent alterations and irregularities related to the seats and carpeting in the vehicle consistent with attempts to conceal contraband. Further examination of the vehicle was conducted with the assistance of a camera scope. With the assistance of the camera, law enforcement observed plastic packaging with brown sealed tape consistent with packaged narcotics.

The vehicle was moved to the United States Border Patrol office to finish searching in a safer environment. A thorough search of the vehicle revealed a total of 84 individually wrapped packages of cocaine which weighed approximately 84 kilograms in total. The cocaine was recovered from several hidden compartments within the vehicle.

ANTEOLA conspired with the co-defendant, Melissa DUFOUR, and others to possess with the intent to distribute the cocaine. The defendant DUFOUR and ANTEOLA were hired by others as couriers. Examination of DUFOUR and ANTEOLA's cell phone location data revealed that DUFOUR and ANTEOLA had made a number of similar trips together between November 2022 and June 2023.

The United States and the ANTEOLA agree and recommend to the Court that the ANTEOLA be held accountable for between 50 kilograms and 150 kilograms of cocaine for purposes of relevant conduct in the case.

Respectfully submitted,

AGREED TO AND SIGNED.

SEAN P. COSTELLO
UNITED STATES ATTORNEY

Date: November 29, 2023

/s/ George F. May
GEORGE F. MAY
Assistant United States Attorney

Date: November 29, 2023

/s/ Elizabeth P. Stepan
ELIZABETH P. STEPAN
Assistant United States Attorney

Date: November 29, 2023

/s/ Kacey S. Chappellear
KACEY S. CHAPPELEAR
Assistant United States Attorney
Deputy Criminal Chief

Date: 11 / 30 / 23



RACQUELLE MARIE DOLORES ANTEOLA
Defendant

Date: November 30, 2023

/s/ Stephen C. St Martin
STEPHEN C. ST. MARTIN
Attorney for Defendant